

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

OLA TALAL ABU ALRUB
Plaintiff

v.

PUERTO RICO PORT AUTHORITY,
PRATT & WHITNEY PUERTO RICO,
INC, OTIS ELEVATOR COMPANY,
IBERIA LINEAS AEREAS DE ESPAÑA
SA

Defendant(s)

CIVIL NO. 21-CV-1203(PAD)

2021 MAY -4 AM 9:24
CLERK OF COURT
U.S. DISTRICT COURT
SAN JUAN, PR

PRO SE COMPLAINT

I. Statement of Jurisdiction

Airplane product liability, other personal injury, other civil rights, other statutory actions.

II. Statement of Parties

A. Luis Muñoz Marin International Airport
Aeropuerto Ave, Carolina, PR 00979

B. Puerto Rico Port Authority
Calle Lindbergh #64
Antigua Base Naval Miramar
San Juan, Puerto Rico 00907

PO Box 362829
San Juan, PR 00936-2829

C. Pratt & Whitney Puerto Rico, Inc.
Road 110 North Km 28.8 San Antonio Industrial Park
Aguadilla, PR, 00603

- D. Otis Elevator Company
Urb. El Paraiso, 121 Calle Ganges
San Juan, PR 00926-2915
- E. Iberia Lineas Aéreas de España S.A.
Metro Office Park
Building 3 Office 102
Guaynabo, PR 00968

P.O. Box 12008
San Juan, PR 00914
- F. OSHA PUERTO RICO
Prudencio Rivera Martinez Building 505
Muñoz Rivera Avenue
Hato Rey, PR 00918
- G. Cruz Moya – Elevator Consultants
Tintillo Gardens
G6 8th Street
Guaynabo PR 00966
- H. Luis E. Fauna Clavell, M.D.
Caparry Gallery
Oregon St #107 Suite 308
Guaynabo PR 00966
- I. Lic. Sigfredo Irizarry Semidei
Banco Cooperativo Plaza
Suite 501B
Ponce de León Ave #623
San Juan PR 00918

P O Box 363261
San Juan PR 00936-3261
- J. Jorge Antonio Gratacos Ramos
Calle 1 Bloque 2 #5
Alturas de Torrimar
Guaynabo PR 00969
- K. US Embassy Jerusalem
Palestinian Affairs Unit
14 David Flusser
Jerusalem 9378322 Israel

L. Ola Talal Abu Alrub
Jardines del Caribe
33 St FF27
Ponce PR 00728

M. Amer Rashed Ahmad
Jardines del Caribe
33 St FF27
Ponce PR 00728

III. Statement of Claims

I was traveling on the Iberia airline with my three children of 9 years, 5 years and a year and six months to my home of residence in Puerto Rico. We were returning from Palestine. When I arrived at the Luis Muñoz Marín Airport, I could not use the elevator as they informed me that it did not work. I had to use the escalators. When I asked for help from the security or customer service personnel, they did not come to give me help to go down the escalators with my three children, one of them in my arms since he was only one year and six months old.

I was unaware that the escalators were defective. They were not labeled as defective and I was unaware that Mr. Jorge Antonio Gratacos Ramos was the maintenance supervisor and that Cruz Moya Elevator had issued a report on the escalator which read "equipment malfunction, escalator can cause accident."

Not knowing this and not being labeled the escalator by the airport staff and his supervisor Mr. Jorge Antonio Gratacos Ramos, I proceeded to use the escalator thus exposing my little infant and my two children of 9 and 5 years old and myself.

When the escalator failed, I fell abruptly (see airport videos) and lost consciousness without knowing what had happened to my children. I suffered physical damage, head trauma, dizziness, disorientation, imbalance, insomnia, and depression, among others. I was confined in the University Hospital of Carolina Puerto Rico. After this event my life changed.

When my husband arrived, they did not allow him to enter the scene where the fall occurred due to the failure of the escalator. He was not allowed to take photos and did not allow an escalator technician to check the equipment.

Neither did Mr. Jorge Antonio Gratacos Ramos, Maintenance Supervisor of the Luis Muñoz Marín Airport and an employee of the Ports Authority, when requesting the OSHA Certification, could not produce it and neither did he want to deliver the Negative Report from Cruz Moya Elevator that certified

that the ladder it was faulty. They also did not deliver the videos that showed the entire journey of my person and my children to the escalator and when I abruptly fell into the void.

Nobody noticed and the escalators kept moving, hitting me over and over again in the head and no one from the Airport staff turned them off, causing blows to my back. They did not comment on my one-year-six-month-old daughter, and they didn't comment on who turned off the electric stairs. I was taken to the hospital and administered oxygen and other medications to withstand the acute pain in the neck and chest.

My husband and children suffer my medical situation. The incident creates a direct economic hazard to my husband. The evidence of discrimination against my family, husband and myself without just cause is a violation of my civil and constitutional rights as a citizen of the United States of America for the last 30 years.

IV. Statement of Relief

After all my medical treatments since the incident I lost my confidence as mother. I am paranoid and afraid my body is not the same and medications make me anxious. My productive years are gone since this happen. I sacrifice my family because I was in the Hospital several times because of the cervical and back injuries, chest, and legs.

Is my understanding to the best of my knowledge and all the damages cause by Otis Elevator, a subsidiary of Pratt & Whitney Aircraft, Port Authority of Puerto Rico, and others that decide not to talk with the true.

To my family (children) and husband to be compensated with \$950,000.00 in damages since the incident occur. Also, to be compensated with all moral, medical and economic damages.

I respectfully submit to the will of the court in observance of my rights and justice.

Ola Talal Abu Alrub

OLA TALAL ABU ALRUB
Jardines del Caribe
33 St FF27
Ponce PR 00728
Phone number 787-298-1126